

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM, RICHARD §
KING, MICHAEL DENTON, FRED WALLACE, §
and MARVIN RAY YATES, individually and on §
behalf of those similarly situated, §

Plaintiffs,

V.

BRYAN COLLIER, in his official capacity, §
ROBERTO HERRERA, in his official capacity, and §
TEXAS DEPARTMENT OF CRIMINAL JUSTICE, §

Defendants.

CIVIL ACTION NO.
4:14-cv-1698

PLAINTIFFS' MOTION FOR CONTEMPT, TO SHOW CAUSE & SANCTIONS

Exhibit 9

1st Declaration of R. Anderson

DECLARATION OF RANDALL ANDERSON

1. My name is RANDALL ANDERSON.
2. My date of birth is 10/12/1956.
3. My TDCJ number is 2017323.
4. I have been an inmate in the Texas Department of Criminal Justice (TDCJ) since AUGUST 2015.
5. I am assigned to the LeBlanc Unit at 4-K-29 bottom.
6. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated herein are within my knowledge and are true and correct.

RLH ° ~~EVERY~~ I WAS TRANSFERRED TO THE LEBLANC UNIT
ON MARCH 22, 2019.

RLH ° DURING MOST DAYS THIS SUMMER, I HAVE
FELT VERY HOT, SWEATY, AND DIZZY IN
MY HOUSING AREA AT LEBLANC.

RLH ° THE HALLWAY OUTSIDE MY HOUSING AREA IS
MUCH COOLER THAN MY HOUSING AREA.

RLH ° I AM PRESCRIBED PSYCHOTROPIC MEDICATIONS.

RA

◦ I AM NOT PERMITTED TO TAKE COLD

SHOWERS AT THE LEBLANC UNIT.

RA

◦ BASED ON MY EXPERIENCE WITH TEMPERATURE

IN THE OUTSIDE WORLD WHEN I HAD ACCESS TO

THERMOMETERS, THE TEMPERATURE IN MY

HOUSING AREA HAS OFTEN EXCEEDED 90° F

THIS SUMMER.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature: Randall Anderson Dated: 7-19-2019

Printed Name: Randall Anderson